

Facility Name

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Project Manager Signature



J. Manheimer Inc. 47-22 Pearson Place • Long Island City, New York 11101-4481
718 392-7800 • Fax 718 392-7985 • Web www.manheimer.com

September 29, 2000

Mr. Abdool H. Jabar
Environmental Engineer
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance
290 Broadway
New York, NY 10007-1866

EPA-REGION II
OCT 2 AM 11:2
00 SEP 92
RCRA COMP. BR.

Dear Mr. Jabar:

The following information is enclosed regarding our regulatory procedures:

- I. Our facility Closure Plan.
- II. A list of the people responsible for supervising the handling of hazardous waste and a description of their duties and responsibilities.
- III. Copies of correspondence with the medical facilities to which we send our personnel in the event of an injury.
 - A. Notice from our insurance carrier to send our people to Rapid Medical Care during regular hours and to Western Queens Community in the event of an after hours injury.
 - B. Letter to St John's Queens Hospital describing our operation. A copy of the facility contingency plan was enclosed.
 - C. Letter to Rapid Medical Care - same as B. above.
 - D. Letter to Western Queens community - same as B. above
- IV. Our current inspection procedure and a copy of the new hazardous waste inspection log.

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EPA-REGION II
OCT 2 AM 11:2
00 OCT -2
RCRA COMP. BR.



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- V. A description of the qualifications of the members of the Regulatory Affairs Department and how we stay current with the regulations and technology related to Hazardous Waste Management.

If you should need any additional information, please contact me at your convenience.

Sincerely,
J. Manheimer, Inc.

Michael I. Londner, CSP
Vice President, Regulatory Affairs

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J. MANHEIMER, INC.
47-22 PEARSON PLACE
LONG ISLAND CITY, NEW YORK 11101

CLOSURE PLAN

1.0 Operation

J. Manheimer, Inc., located at above address is primarily a manufacturer of Flavor and Fragrance compounds. the following operations are conducted at the facility:

- 1.1 Blending (mixing) of purchased materials into proprietary formulations for the flavor and fragrance industry.
- 1.2 Repackaging and selling flavor and fragrance materials,
- 1.3 Folding (concentrating by distillation) flavor materials.
- 1.4 Reacting flavor materials to produce proprietary formulations.

100% of the charge to the equipment is collected as product. No waste, hazardous or otherwise, is generated as a planned part of the operation.

2.0 Source of Hazardous Waste

2.1 Laboratory Samples

Raw material and product samples are continuously taken as a part of the operation to monitor quality and use for test blending. These samples, representative of quality material, are disposed of periodically by bulking into containers and sold as "Potpourri".

Occasionally a customer cannot be found for the potpourri and it is decided to dispose of the material. The determination is made after periodic inventory and marketing evaluations.

If the material is flammable, it is considered hazardous waste and handled accordingly. Flammability is the only hazardous property at this facility.

2.2 Off-quality Material

Occasionally a compound is blended for sale that does not meet a customer's requirements. An attempt will be made to sell the "off-quality" material similarly to the marketing of potpourri. If the material cannot be sold, it will be disposed of in the same manner as potpourri as noted in para. 2.1.

3.0 Storage of Hazardous Waste.

All hazardous waste is stored in drums in environmentally safe areas.

NO WASTE MATERIAL IS STORED OUTSIDE OF CONTAINERS OR IN PILES ON THE GROUND.

4.0 Disposal of Hazardous Waste

When material is designated hazardous waste, it is handled and disposed of in the prescribed manner.

5.0 Closure

5.1 Implementation

Closure can be implemented by moving all inventory and equipment to another location. Only an empty building will be left on-site. Neither the building nor the ground is expected to be contaminated,

5.2 Existing Hazardous Waste

If any hazardous waste is on-site at the time of closure, it will be disposed of through the normal prescribed means.

5.3 Spills

If a spill should occur during closure the contingency plan would be activated and the spilled material cleaned-up using an oil absorbent. The absorbed material would be shoveled into containers. Spilled material caught in a diked area would be pumped directly to drums.

This collected waste material would be disposed in the prescribed manner.

5.3.1 A solids waste handling company would be contracted to dispose of the waste. The handler would verify, through independent analysis, our analytical results.

5.4 Certification

The services of an independent professional engineer would be obtained to certify that closure has been completed in the prescribed manner.

J. MANHEIMER, INC.
47-22 Pearson Place
Long Island City, New York 11101

HAZARDOUS WASTE REMOVAL

J. Manheimer, Inc. does not generate hazardous waste as a planned part of the operation. Occasionally inventory is determined to be unsaleable and the decision is made to dispose of it. If the material is flammable it is considered hazardous.

When it is determined to dispose of the material, a licensed hazardous waste disposal company is contacted. If not already on file, a profile of the type of waste is made by the waste disposal company listing the physical, chemical, toxic and waste characteristics.

The following personnel are responsible for supervising the handling of the hazardous waste:

Michael Londner, V.P. Regulatory Affairs

- Establish company standards for the handling of hazardous waste.
- Review training of personnel in the various aspects of JMI hazardous waste activities.
- Evaluate hazardous waste disposal companies and verify their credentials.
- Inspect the site where hazardous waste is stored daily to verify it is being done correctly.

John Keegan, Engineering & Safety Associate

- Training new employees in right-to-know and awareness of JMI role as a hazardous waste generator.
- Inspect the site where hazardous waste is stored daily to verify it is being done correctly

Raymond Kennedy, Director Inventory Management

- Training shipping personnel in the procedures for preparing hazardous waste drums for shipping and loading them on the truck.
- Supervising the movement of the material, which is determined to be waste, to the loading area.

- Supervising the preparation, labeling and loading of the hazardous waste.
- Interfacing directly with the hazardous waste disposal company personnel.

John Nolan, Production Manager

- Training operating employees in the handling, labeling and storage of material that becomes hazardous waste.

Anthony Calzaretta, Manager Traffic Warehouse

- Supervising the movement of the material, which is determined to be waste, to the loading area.
- Supervising the preparation, labeling and loading of the hazardous waste

9/19/00
M.I.L.

PHYSICIAN LISTING

If you are hurt on the job,
report your injury *immediately*
to your supervisor. Your
supervisor will then recommend
a physician, or you can select
any one of the following
physicians who are experts in
workplace health issues.

Rapid Medical Care
33-16 Broadway
Astoria, NY 11106
Contact: Joseph Barbagallo

Phone: 718-932-5252
Fax: 718-728-5105
Hours: M-Sun 9:00am-10:00pm
Status: DP (non contracted)*

In the event of an after hours injury, proceed to :

Western Queens Community
25-10 30th Ave.
Long Island City, NY 11102
(718) 932-1000

**** IN THE EVENT OF A LIFE THREATENING INJURY - DIAL 911

For a listing of additional providers please contact your human resources representative.

MANAGED COMP'

The leader in managed care workers' compensation

J. MANHEIMER *inc.*

47-22 PEARSON PLACE • LONG ISLAND CITY • N.Y. 11101 • (718) 392-7800



TELEX: ITT 420422
WU 620051
FAX: (718) 392-7985

November 30, 1990

St John's Queens Hospital
Div of Catholic Medical Center of Brooklyn & Queens Inc
90-02 Queens Blvd.
Elmhurst, New York

Attention: Emergency Coordinator

In response to the requirements of the New York State Department of Environmental Conservation we are enclosing a copy of the following:

1. Facility Contingency Plan
2. Layout of Facility showing hazardous waste storage area
3. Map of local streets to determine access to our facility and possible escape routes

J. Manheimer, Inc. is primarily a Blender of Flavor and Fragrance Materials to produce a product for sale to downstream manufacturers. 100% of the material charged to the equipment is collected as product. No waste, hazardous or otherwise, is generated as a planned part of the operation.

Occasionally, a customer cannot be found for a product, generally because it does not meet specifications, and it will be decided to dispose of the material. This determination is made after periodic inventory and marketing evaluations.

If the material is flammable, it is considered hazardous waste and handled accordingly. Flammability (a very small portion of our inventory) is the only hazardous property handled at this facility.

If you should have any questions, please contact us at your earliest convenience.

Sincerely,
J. Manheimer, Inc.

Michael I. Londner
Director Engineering & Safety





J. Manheimer Inc. 47-22 Pearson Place • Long Island City, New York 11101-4481
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September 27, 2000

Rapid Medical Care
33-16 Broadway
Astoria, NY 11106

Mr. Joseph Barbagallo:

In response to the requirements of the New York State Department of Environmental Conservation and the U.S. Environmental Protection Agency we are enclosing a copy of our Facility Emergency Plan which includes a map of local streets to determine access to our facility and possible escape routes

J. Manheimer, Inc. blends flavor and fragrance materials to produce a product for sale to downstream manufacturers. 100% of the material charged to the equipment is collected as product. No waste, hazardous or otherwise, is generated as a planned part of the operation.

We operate a scrubber for one process. Dilute sodium hydroxide is used as the scrubbing medium and, when spent, is disposed of according to hazardous waste regulations.

Occasionally, a customer cannot be found for a product because it does not meet specifications, and it will be decided to dispose of the material. This determination is made after periodic inventory and marketing evaluations.

If the material is flammable, it is considered hazardous waste and handled accordingly. Flammability and corrosivity (a small portion of our inventory) are the only hazardous properties found at this facility.

If you have any questions, please contact me at your convenience.

Sincerely,
J. Manheimer, Inc.

Michael I. Londner, CSP
Vice President, Regulatory Affairs

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September 27, 2000

Western Queens Community
25-10 30th Ave.
Long Island City, NY 11102

Attention: Emergency Coordinator

In response to the requirements of the New York State Department of Environmental Conservation and the U.S. Environmental Protection Agency we are enclosing a copy of our Facility Emergency Plan which includes a map of local streets to determine access to our facility and possible escape routes

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Sincerely,
J. Manheimer, Inc.

Michael I. Londner, CSP
Vice President, Regulatory Affairs

J. MANHEIMER, INC.
47-22 Pearson Place
Long Island City, New York 11101

HAZARDOUS WASTE MANAGEMENT

INSPECTIONS

Michael Londner and John Keegan tour the plant a minimum of once daily. We check primarily for safety but also monitor other regulatory activities.

Safety: Wearing of personal protective equipment, operating mechanical equipment properly, storing materials correctly, observance of OSHA and internal company standards.

Sanitation: Maintenance of GMP (good manufacturing practices), general cleanliness, wearing hairnets, sanitary operations, cleaning equipment.

Regulatory: Fans, dust collectors, scrubbers running; standpipes in place; hazardous waste handled properly and observance of general regulatory regulations.

We have not maintained a log of this activity (since corrected), but we do assure that amendatory action is taken to correct improper procedures. A copy of the new daily log is enclosed.

Formal safety inspections are made three times a month (covering three different areas of the plant) by three different teams. Hazardous waste violations, if any, are noted during these inspections.

HAZARDOUS WASTE INSPECTION LOG

REMARKS	INITIALS	DATE
OK	MD	9/18/00
4 UNMARKED OIL DRUMS	SSK	9/25/00
ALL 4 DRUMS MARKED	SSK	9/27/00
OK	MD	9/28

J. MANHEIMER, INC.
47-22 Pearson Place
Long Island City, New York 11101

HAZARDOUS WASTE MANAGEMENT

Michael I. Londner, C.S.P.

QUALIFICATIONS

I am responsible for the management of hazardous waste for J. Manheimer, Inc.

I have a B.S. in Chemical Engineering, 30 + graduate credits towards an MBA and over 40 years experience in the chemical industry. I am a Certified Safety Professional and am active in the American Society of Safety Engineers where I am currently the treasurer of the Metropolitan Chapter.

I developed the J. Manheimer, Inc. hazardous waste management. I wrote the lesson plans and developed the training aids including slides and quiz and supervise the maintenance of the attendance records (signed by the participant) and test scores.

I trained the people involved in the handling of hazardous waste and trained John Keegan in the presentation of the information. I audit John's course annually to assure that we are maintaining the established standards.

I keep informed of new technological developments and the law by extensive reading. I receive approximately 3 dozen technical journals and publications a month. I read about 12 thoroughly and scan the rest. Included in the journals are:

Chemical Engineering	Compliance Magazine
Environmental Protection	Environmental Solutions
Pollution Engineering	Pollution Engineering
Water & Wastes Digest	

Periodically I attend outside seminars to verify that my knowledge is current. The latest was a course given by Lion Technology, Lafayette NJ, "Hazardous Waste in New York", 6/23/97. Prior to that I attended the following related seminars:

Hazardous Waste Management - RCRA Seminar, 9/27/90 - Environmental Resource Center

Hazardous Materials Transportation Seminar, 9/24,25/92 - Unz & Co.

Environmental Regulation Course, 5/17-19/93 - Executive Enterprises, Inc.

Hazardous Materials Safety Seminar, 3/12/96 - InterTrans Services, Inc

Managing Hazardous Wasted in New York, 6/23/97 - Lion Technology, Inc..

John Keegan

QUALIFICATIONS

John Keegan has a B.S. in Chemical Engineering and a B.A. in Chemistry. He was trained by me to do the training of others at JMI and I audit at least one of his classes annually. John attended the following related seminar:

Hazardous/Toxic Waste Management Seminar, 6/18/99, Lion Technology